



U.S. Department of Justice

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District of New Jersey
Civil Division

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February 3, 2025

Via ECF

Hon. Edward S. Kiel, U.S.D.J.
United States District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

ORDER

Re: *Fazenbaker, et al. v. CompleteCare*, Civ. No. 24-cv-11170
Joint request for extension of briefing calendar

Dear Judge Kiel:

I write on behalf of the parties to seek an extension of the remaining deadlines in the briefing calendar regarding the motion to remand this case and CompleteCare's planned cross-motion to substitute the United States as defendant. *See* ECF No. 8.

Having conferred by telephone and e-mail, the parties respectfully request that the remaining deadlines be extended as follows:

- Tuesday, February 11, 2025: CompleteCare to file its opposition to the motions to remand.
- Tuesday, March 4, 2025: Plaintiffs and the United States file their final briefs in support of their motions to remand.

CompleteCare has advised that, given the arguments made by Plaintiffs and the United States in their motions that the Court does not have jurisdiction to hear this matter, it believes that its planned cross-motion to substitute the United States as defendant should be deferred pending Your Honor's decision on the motions filed by Plaintiffs and the United States. Plaintiffs and the United States do not object to this deferral of the cross-motion to substitute.

Hon. Edward S. Kiel

February 3, 2025

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I submit that there is good cause to grant the requested extension to the briefing calendar and narrowing of the scope of the briefing. The issues in this matter are complex, requiring additional time for the parties to describe them and discuss their positions with appropriate points and authorities. In addition, I have several immovable professional and personal obligations in the near term, making the existing briefing calendar difficult to fulfill, particularly for briefing on novel issues of this kind. Counsel for the other parties kindly assented to my request that we seek a joint extension to the calendar to accommodate those matters.

If this request meets with Your Honor's approval, I respectfully request that that you "So Order" this letter and have the Clerk's Office file it on the docket.

Respectfully submitted,

VIKAS KHANNA

Acting United States Attorney

By: /s/ John T. Stinson
JOHN T. STINSON
Assistant United States Attorney

cc: counsel of record (via ECF)

So Ordered.

/s/ Edward S. Kiel.
Edward S. Kiel, U.S.D.J.
Date: February 10, 2025